

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2021-192-E

In re:

Dominion Energy South Carolina,
Incorporated Coal Retirement Docket
Opened Pursuant to Commission Order
No. 2021-418

**SIERRA CLUB'S FIFTH SET OF
DATA REQUESTS
May 2, 2022**

Pursuant to R.103-833 of the South Carolina Code of Regulations, Intervenor Sierra Club, by and through undersigned counsel, serves the following data requests on Dominion Energy South Carolina, Inc. ("Dominion" or the "Company") in the above referenced consolidated dockets. These requests are continuing in nature to the extent permitted by the rules of the South Carolina Public Service Commission and the South Carolina Rules of Civil Procedure.

INSTRUCTIONS

1. These requests should be regarded as continuing. If, after filing its initial response to the interrogatories and requests, the Company becomes aware of any information that would alter or amend any responses, please provide updated responses as additional information becomes available.
2. If a response to any of the attached requests requires any calculations, analyses, assumptions, or studies, please identify and provide copies of such calculations, analyses, assumptions, or studies—including all work papers relating thereto. For any analyses or calculations prepared

using electronic workbooks, please provide operational versions of those spreadsheets as well as all operational versions of all supporting workbooks used to develop inputs.

3. Produced documents should include originals and all other copies which are not absolutely identical as well as all drafts and notes (whether typed, handwritten or otherwise) made or prepared in connection with such documents, whether used or not.
4. With respect to requests for analyses or calculations that were prepared using electronic workbooks, please provide operational versions of those spreadsheets (i.e., with calculations active) as well as all operational versions of all supporting workbooks used to develop inputs.
5. Unless otherwise specified, all requests for documents herein pertain to the Company's South Carolina operations. Please ensure that all responses are specific to the Company's South Carolina service territory. Where South Carolina-specific data are not available, please provide an appropriate factor, method or percentage to allow for an accurate estimate of South Carolina-specific data to be performed.
6. If you consider any document to be privileged or protected from production, then you must:
(i) include in your response a list of documents withheld from production, (ii) identify each document by date, addressee, author, title and subject matter, (iii) identify those persons who have seen the document or who were sent copies, and (iv) state the ground(s) upon which each such document is considered privileged or protected.
7. Due to COVID-19 and most people working remotely, please deliver all responses to the following interrogatories and requests for production of documents **electronically** to:

Robert Guild	bguild@mindspring.com
Dorothy E. Jaffe	dori.jaffe@sierraclub.org
Justin T. Somelofske	justin.somelofske@sierraclub.org

DEFINITIONS

1. The “Company” is defined to include both Dominion Energy South Carolina, Inc. and any consultants or other agents that assisted in the development or preparation of the plan for electric distribution grid transformation projects.
2. “Communications” shall mean all oral communications and all written communications, including all “documents,” as defined below.
3. “Describe” means to state in detail each and every basis for the position taken or the statement made in response to the request and includes identifying each and every statement or document relied on and provide a copy of all such identified documents.
4. “Document” is defined to include all materials, of any kind or description, in any medium, regardless of where or how maintained or accessed (such as in or through official work or personal files, accounts, or devices). Documents include, by way of illustration only, correspondences, papers (including working papers), electronic mail (including any attachments), telegrams, facsimiles, notes, sound or video recordings, voice mail, minutes, memoranda, inter- or intra-office communications, diaries, daily logs, records, reports, studies, estimates, surveys, written forecasts, analyses, contracts, licenses, agreements, charts, graphs, indexes, database or other electronic records, statistical records, data sheets, data processing cards, computer printouts, computer discs, videotapes, motion pictures, agendas, meeting invitations, websites, intranet pages, and other electronic communications, any notes or drafts relating to any of the foregoing, and any other documents of any kind in your possession, custody or control or to which you have access or known to exist..
5. “Identify,” “identification,” as used with respect to a person means to state the person’s full name and present address and his present or last known employment position and business

affiliation if a natural person, and corporate or other status and address if not a natural person.

“Identify” or “identity” when used in reference to a document means to state the following as to each document:

- a. Its nature and contents;
 - b. Its date;
 - c. The date it was executed if different from the date it bears;
 - d. The name, address and position of its author or signer;
 - e. The name, address and position of its addressee, if any;
 - f. Its present location and the name, present address and position of the person or persons having present custody; and
 - g. Whether it has been destroyed, and if so, with regard to such destruction; (i) the date of destruction; (ii) the reason for destruction; and (iii) the identity of the person who destroyed the document.
6. “Including” means “including but not limited to.”
 7. “Person” includes any individual, sole proprietorship, partnership, corporation, association, trust, statutory trust, joint venture, or other entity.
 8. “You” or “your” means the Company and its agents, employees, representatives, attorneys, experts, investigators, insurers, consultants, or anyone acting on behalf of the Company.

DATA REQUESTS

Request No. 5-1. Reference the Company’s Response to Sierra Club Requests 4-6(b): “The Company has not yet completed the formal governance process for the ‘ELG compliance project’ at Williams Station and as such, the work is not yet officially approved;” and the Company’s Response to Sierra Club Request 4-8: “The Company has not yet sought formal approval through

the Company's governance process for the 'ELG compliance project.'” When does the Company plan to seek formal approval for the ELG compliance project at Williams Station?

Request No. 5-2. Reference the Company's Response to Sierra Club Request 4-7, and attachments entitled “ELG Compliance – 7-20-2021.pdf” (the “July 2021 attachment”) and “2021 ELG Briefing – March 3, 2021.pdf” (the “March 2021 attachment”). The March 2021 attachment, at slide 10, states, “Williams expects to opt into the Voluntary Incentive Program.” The July 2021 attachment, at slide 4, states under the Williams Heading: “Recommending use Treat & Discharge Method (12/31/2025 compliance).” Please explain and produce all documents that discuss the Company's decision to switch from the Voluntary Incentive Program to the Treat and Discharge Method (12/31/2025 compliance) between March 3, 2021 and July 20, 2021.

Request 5-3. Reference the Company's Response to Sierra Club Request 4-7 and the July 2021 attachment. The July 2021 attachment, , at slide 6, states: “Fourth quarter of 2022: bid and award equipment and installation.” Does the Company need Investment Review Committee approval prior to bidding and awarding for equipment and installation?

Request 5-4. Reference the Company's Response to Sierra Club Request 4-7 and the July 2021 attachment. The July 2021 attachment, at slide 6, states: “2023-2024: construction.” When does the Company intend to start construction on the ELG compliance project at Williams Station?

Request 5-5. Reference the Company's Response to Office of Regulatory Staff Request 1-24 in Docket No. 2021-9-E (Dominion Energy South Carolina, Inc. 2021 Integrated Resource Plan (IRP)), where the Company stated it used the following assumptions for “expenses that will be required to meet Effluent Limitation Guidelines (“ELG”) requirements for Wateree and Williams if those units are assumed to operate after 2028[:.]”

Williams: \$141,610,000 in 2026\$

Wateree: \$113,575,000 in 2026\$

Please provide any update to these assumptions on ELG expenses at both Wateree and Williams.

Respectfully submitted this 2nd day of May, 2022.



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Counsel for Sierra Club

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CERTIFICATE OF SERVICE

I hereby certify that I have served the persons listed on the official service list for Docket No. 2021-192-E, listed below, a copy of the Sierra Club's Fifth Set of Data Requests via electronic mail on this day, May 2, 2022.

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